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September 12, 2000

Paul C. Besozzi
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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte Filing - CC Docket No. 94-102

Dear Ms. Salas:

On September 12, 2000, FindComm, Inc. provided a copy of the attached previously-filed ex parte communication to the Legal Assistants for wireless matters for Chairman Kennard and Commissioners Ness, Powell, Trustiani and Furchtgott-Roth.

Sincerely yours,

Paul C. Besozzi
PCB/lyt

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FindComm, Inc.

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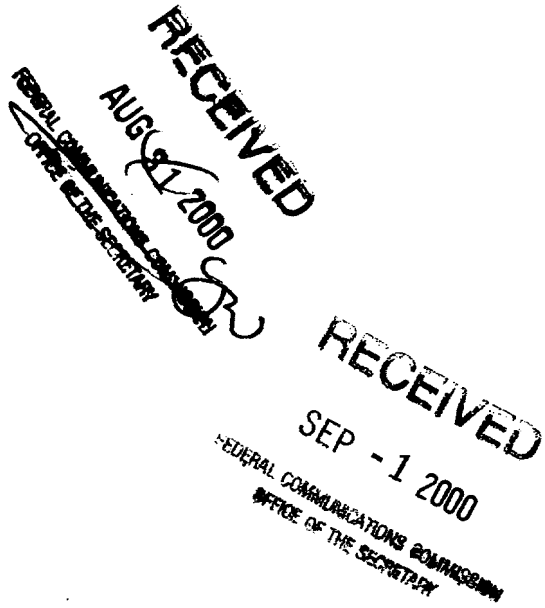

August 30, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Ex Parte Filing of Motorola, Nokia and Ericsson of August 18,2000
In CC Docket No. 94-102

Dear Ms. Salas:

I am writing on behalf of FindComm, Inc. in reference to the Ex Parte filing from Motorola, Nokia and Ericsson of August 18, 2000. FindComm, Inc. is a newly organized company with a proven technology that has been deployed in wireless location for trucking fleets. The company has adapted its system to provide the delivery of location information over any existing wireless network. We concur that the Qualcomm/SnapTrack solution would encompass only a small sector of wireless E911 callers. However, for reasons presented herein we encourage you to maintain your current timeline for industry adoption of location enabled E911 wireless services.

At present, we find that the industry is offering fragmented and incomplete solutions. This is a natural result of differing transmission requirements among wireless platforms. Typically when a 911 wireless call is made a system for locating the phone must be applied. Several effective methods have been demonstrated, including handset/GPS systems and network-based solutions. After the location has been determined, it must be communicated to the PSAP. This is where the incompatibility of differing platforms causes a problem. For example, when a digital phone moves outside its particular digital network, it switches to analogue mode. No system has been developed that accommodates these changes, i.e. the location must be reported to the

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appropriate PSAP automatically and across whichever type of wireless interface is in use. The result has been numerous partial solutions. Some industry members have solved the problem for their own networks (in some cases requiring significant infrastructure to be built) but, as yet, no solution has been presented that will allow any wireless 911 caller's position to be communicated across any wireless network. FindComm has discovered such a solution which is briefly described herein. Foremost however, we are concerned that the current situation could result in unnecessary delays, or partial/inadequate deployment of the existing piecemeal solutions. We believe that without appropriate guidance from your offices the industry will be unable to resolve the E911 location problem effectively.

As discussed in the August 18, 2000 filing, Motorola, Nokia and Ericsson recognize that handset/GPS solutions still require some development work before commercial deployment. Motorola, Nokia and Ericsson recognize that such development will have to consider the platform of the air wireless interface, and these companies object to Qualcomm's "skimming over differences in air wireless interfaces, overly generalizing, overstating capabilities, and exaggerating development progress..." In addition to this controversy which has now become apparent in the transmission of GPS-based information among various platforms , we suggest that similar conflicts will emerge for the various network-based solutions. It is not the intent of this letter to take sides in these controversies, but rather, only to point out that they exist because no universal solution, like that of FindComm, has been presented.

We want it to be a matter of record that a universally adoptable, readily deployable solution exists which will enable automatic location reporting between the 911 wireless caller and the appropriate PSAP. The technology works on all location types, GPS-based or various network solutions; on all wireless phone types, analogue or digital (all types); on all existing telephone switch architectures; and, on all air wireless interfaces. FindComm's solution is non-complex, and software-based. In addition, it is inexpensive and readily deployable.

Specifically, our technology converts the caller's location to a ten-digit FindComm number, which seamlessly flows through all existing phone architectures. For transmission purposes, the specific location of a 911 caller becomes a phone number, which the company's algorithm readily recognizes as a 911 call, sends it to the appropriate PSAP and reconverts it to a location for the PSAP. Please refer to our patent # 6085097 and our patent applications: 09/345598 and09/022558. Currently the company is preparing the first live, community-based demonstration of its system.

Due to the current state of the industry, the major concern we have is that service providers will suggest that they are unable to comply with FCC timelines because the existing solutions cannot be deployed in a timely matter. We think that this may result in an unnecessary delay. We look forward to working with industry members, and to your solid support of existing timelines, so that the public will be served readily and efficiently in this matter.

We would welcome the opportunity to provide you with further information about our vision for how a fully integrated and universal 911 wireless location system would best serve your agency's purposes.

Sincerely,

Paul J. Flagg
Senior VP Corporate Development

CC: Kurt Hielstrom, President
L.M. Ericsson Telephone A.B.

R.L. Growney, President
Motorola, Inc.

Jorma Ollila, CEO
Nokia Corporation